

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 24-cr-20311-KMM

UNITED STATES OF AMERICA,

Plaintiff,

v.

PEDRO JUAN DOMINGUEZ,

Defendant.

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**DEFENDANT PEDRO JUAN DOMINGUEZ' UNOPPOSED MOTION  
TO CONTINUE TRIAL AND RELATED DEADLINES**

Defendant PEDRO JUAN DOMINGUEZ, (Mr. Dominguez), by and through his undersigned attorney, pursuant to F. R. Crim. P. 12, files his Unopposed Motion to Continued Trial and Related Deadlines, and in support thereof, states as follows:

1. This case is set for Trial during the two-week period commencing on April 7, 2025. (See ORDER SETTING PRE-TRIAL SCHEDULE AND PROCEDURES [DE 20]).
2. While Defendant has received some discovery in this case, undersigned counsel needs additional time, not only to review that discovery, but also to review additional discovery and other relevant documents in related cases

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and to subsequently review all of that with his client, who remains in pretrial detention.

3. Consequently, Defendant needs and respectfully requests a 60-day continuance of the Trial of this case in order to properly prepare an adequate defense.

4. Undersigned counsel respectfully requests as well that this Honorable Court find that the ends of justice served by taking such action outweigh the best interests of the public and the Defendant in a speedy trial. See 18 U.S.C. § 3161(h)(7).

5. A factor to be considered in determining whether to grant a continuance is whether the failure to grant such a continuance would either be likely to make a continuation of the proceeding impossible, or result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(i) and (ii).

6. Undersigned counsel certifies that this continuance is sought in good faith, not for the purposes of delay, but so that justice may be done.

**CERTIFICATE OF GOOD FAITH CONFERRAL**

7. The undersigned conferred with Assistant United States Attorney Kevin Gerard, who indicated that the Government does not oppose the continuance sought herein.

**WAIVER OF SPEEDY TRIAL**

8. Defendant, PEDRO JUAN DOMINGUEZ, by and through his undersigned attorney, hereby waives his right to a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. § 3161, from March 26, 2025, through and including the next scheduled trial date.

**WHEREFORE**, the Defendant, PEDRO JUAN DOMINGUEZ, respectfully requests that this Honorable Court enter its Order continuing the trial of this cause for a period of sixty days and reset all related deadlines, for the foregoing reasons.

**DATED:** March 26, 2025.

Respectfully submitted,

**Donet, McMillan & Trontz, P.A.**

By: /s/ David A. Donet, Jr.

**David A. Donet, Jr., Esq.**

Florida Bar No.: 128910

Attorney for Defendant

[Certificate of Service on next page]

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on March 26, 2025, undersigned counsel electronically filed the foregoing Defendant's Unopposed Motion to Continue Trial and Related Deadlines with the Clerk of the Court using CM/ECF, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

**Donet, McMillan & Trontz, P.A.**

By: /s/ David A. Donet, Jr.

**David A. Donet, Jr., Esq.**

Florida Bar No.: 128910

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